

Juror #: _____

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

Docket No. 15-CR-252 (S-3) (PKC)

FULL PLAY GROUP, SA, HERNAN LOPEZ,
and CARLOS MARTINEZ,

Defendants.

-----X

THE HONORABLE PAMELA K. CHEN
UNITED STATES DISTRICT JUDGE
UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST
BROOKLYN, NEW YORK

THIS PAGE IS THE QUESTIONNAIRE COVER SHEET.
PLEASE TEAR OFF THIS PAGE AND TAKE IT WITH YOU.

After submitting this form, please CALL the following telephone number on **XX-XX-XXXX** after **XX:XX p.m.** Upon calling, you will receive instructions about the date on which you are to report back to court. It is extremely important that you know the juror number written on the top of this form when you make your call. Thank you.

Phone number: 1-800-522-5100

Date to call: **XX-XX-XXXX**

Time to call: after 7:00 p.m.

Juror #: _____

Instructions

The purpose of this questionnaire is to provide information to determine whether you can be a fair and impartial juror. Upon your oath or affirmation, you must give true and complete answers to every question. These questions are not meant to ask unnecessarily about personal matters. Rather, these questions will help the Court determine whether you can be fair and impartial in deciding this case and will also provide information about you as a juror to help the parties select a jury. Part of the selection process depends on your ability and promise to follow the law as it is explained by the Court. Thus, some of the questions include descriptions of legal principles and ask whether you can conscientiously follow them.

Where indicated, please check the space for “Yes” or “No” and, as requested, furnish answers, explanations, and/or details in the spaces provided. Please print your answers in blue or black ink. Please do not leave any questions unanswered. If you do not understand a particular question or do not know the answer, please write either “I do not understand,” or “I do not know” in the space provided for the answer. If there is not enough space for you to complete the answer to a question, please continue your answer in the margin next to the question or in the space provided at the end of the questionnaire. Do not write on the back of any page of the questionnaire. If you feel that a question does not apply to you, please write “N/A” in the space provided for the answer.

When you return to court, the Judge may ask specific questions about some of the information you provided in the questionnaire. When these follow-up questions are asked, if there are any matters that you do not wish to discuss in open court, please indicate that on the questionnaire where asked about your wish for privacy so that arrangements can be made for you to discuss these matters privately.

All of your responses will remain confidential. Do not discuss the questions or answers with anyone, including your fellow jurors. It is extremely important that the answers be your own individual answers.

Jury service is one of the most important civic duties a citizen can be called on to perform. You will be fulfilling your civic duty by responding completely and honestly during jury selection. Your participation in this process is greatly appreciated.

Juror #: _____

Case Information

This is a criminal case. Hernan Lopez, Carlos Martinez, and sports marketing company Full Play Group, SA (“Full Play”) are defendants who have each been charged in a document called an indictment in the Eastern District of New York with various crimes related to the alleged bribery of officials of a soccer organization known as CONMEBOL, which organizes and runs certain Latin American soccer tournaments. Mr. Lopez, Mr. Martinez, and Full Play each deny these charges, has pleaded not guilty, and is presumed innocent unless, and until, the government proves beyond a reasonable doubt that they are guilty of the charges in the indictment. Mr. Lopez, Mr. Martinez, and Full Play are about to go to trial in this case, which is the reason why a jury is being selected. This is just a summary of the charges against them. The Court will instruct the jury as to the elements of the crimes charged and the applicable law at a more appropriate time during trial.

Juror #: _____

PLEASE PRINT LEGIBLY - PLEASE USE ONLY BLUE OR BLACK INK

Background

1. Name: _____
2. Age: _____
3. Gender: _____
4. County of Residence: _____ Years there: _____
5. Neighborhood of Residence: _____ Years there: _____
6. Where were you born? _____
7. Where were your parents born? _____
8. Where were you raised? _____
9. Have you ever lived outside the United States? ☐ Yes ☐ No
 - a. If yes, where and for how long? _____
10. Have you conducted business in South or Central America? ☐ Yes ☐ No
 - a. If yes, please describe: _____
11. Do you have any difficulty reading or understanding the English language? ☐ Yes ☐ No
12. Other than English, what languages do you speak? _____
 - a. If you speak any languages other than English, would you have any difficulty relying solely on a translator's translation of that language? ☐ Yes ☐ No
13. Do you have any physical problem (for example, with your sight or hearing) that would interfere with your ability to serve on this jury? ☐ Yes ☐ No
 - a. If yes, please describe: _____

14. Marital status: [Circle one]
 - a. Single
 - b. Married
 - c. Live with Partner
 - d. Widow
 - e. Divorced/Separated

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15. How far did you go in school? [Circle one]

- a. Attended high school
- b. Graduated from high school
- c. Took some college classes/attended trade school
- d. Received an associate's degree (area) _____
- e. Received a college degree (major) _____
- f. Took graduate courses (area) _____
- g. Received a graduate degree (degree/area) _____

16. What is your current employment status? [Circle one]

- a. Working full-time
- b. Working part-time
- c. Self-employed
- d. Retired
- e. Unemployed
- f. Homemaker
- g. Disabled
- h. Full-time student

17. List your current occupation and employer, or if not currently employed, your most recent occupation and employer.

- a. Employer: _____
- b. Position: _____

18. How long have you worked at your current job? _____

19. What are your job duties and responsibilities? _____

20. What other jobs have you had in your working life? _____

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21. If married, living with a partner, or widowed, what is/was your spouse/partner's occupation or business?

22. Do you own your home, rent, or live with family or friends? [Circle one]

- a. Own
- b. Rent
- c. Live with Family/Friends

23. Please list any groups and/or organizations to which you belong, including professional, religious, political or hobby-related organizations:

Experiences and Beliefs

24. How do you get your news? Please identify the names of any source(s) you use: [Fill in all that apply]

- a. Newspapers: _____
- b. Radio (includes talk radio): _____
- c. Podcast: _____
- d. Television or Cable News: _____
- e. Internet: _____
- f. Social Media: _____

25. How often do you make it a point to follow the news? [Circle one]

- a. Everyday
- b. Almost everyday
- c. Several times a week
- d. Several times a month
- e. Never

26. Do you watch any legal or courtroom TV shows (*i.e.*, Law & Order, The Good Wife, Suits, etc.)? ☐ Yes ☐ No

- a. If yes, please list the shows you watch: _____

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27. Please indicate any prior service as a juror: [Check all that apply]

- ☐ Juror in criminal case in federal or state court
- ☐ Juror in civil case in federal or state court
- ☐ Member of a grand jury in federal or state court
- ☐ None

a. If you served as a juror on a criminal or civil case, was the jury able to reach a verdict?
(Do not state what the verdict was, only whether you were able to reach a verdict.)

☐ Yes ☐ No

b. If you have any type of prior service as a juror, were you the foreperson on the jury?

☐ Yes ☐ No

c. If you have any type of prior service as a juror, is there anything about your previous experience(s) that would make you want to serve or not serve on a jury again?

☐ Yes ☐ No

28. Have you, a family member, or close friend ever been a victim of or witness to a crime?

☐ Yes (self) ☐ Yes (friend/family) ☐ No

a. If yes, please describe the circumstances surrounding the incident(s) and your relationship with the person involved.

b. If yes, did law enforcement personnel respond appropriately?

29. Have you, a family member, or close friend ever been arrested, charged, or convicted of a crime other than routine traffic violations? ☐ Yes (self) ☐ Yes (friends/family) ☐ No

a. If yes, please describe the circumstances surrounding the incident(s) and your relationship to the person(s) involved:

Juror #: _____

- b. If yes, do you believe that you or your family member or friend were fairly treated in connection with such matter? Why or why not?

- c. Would that experience affect your ability to be fair and impartial in this case?
☐ Yes ☐ No

30. Have you, a family member, or a close friend been involved in a lawsuit as a party or a witness? ☐ Yes (self) ☐ Yes (friends/family) ☐ No

- a. If yes, please explain: _____

31. Have you ever served in any branch of the United States Armed Forces (*i.e.*, Marine Corps, Army, Navy, Air Force, Coast Guard, etc.)? ☐ Yes ☐ No

- a. If yes, please note the military branch and how long you were on active duty:

32. Have you, a family member, or friend ever worked in law enforcement (*e.g.*, police officer, detective, sheriff, etc.)? ☐ Yes (self) ☐ Yes (friends/family) ☐ No

- a. If yes, please describe what you/they do/did: _____

- b. If this was a family member/friend, do you talk to them about their work in law enforcement? _____

33. Have you ever applied to work, or seriously considered working, in law enforcement?
☐ Yes ☐ No

- a. If yes, please explain: _____

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34. Have you, a family member, or friend ever served as an official or employee of the U.S. Department of Justice, any of its components, such as the U.S. Attorney's Office, or any other U.S. government agency? ☐ Yes (self) ☐ Yes (friends/family) ☐ No

a. If yes, please describe what you/they do/did: _____

b. If this was a family member/friend, do you talk to them about their work?

35. Have you, a family member, or friend ever worked as part of the criminal justice system (e.g., judge, court personnel, probation officer, correction officer, etc.) or in criminal defense (e.g., attorney, paralegal, investigator, etc.)?

☐ Yes (self) ☐ Yes (friends/family) ☐ No

a. If yes, please describe what you/they do/did: _____

b. If this was a family member/friend, do you talk to them about their work?

36. Other than as set forth above, have you or anyone close to you ever had *any* training or work experience in the law, for example, as a judge, prosecutor, defense attorney, paralegal, legal secretary, court reporter, or any other position in a law-related field?

☐ Yes ☐ No

a. If yes, please describe what you did: _____

37. Have you, or someone close to you, ever been involved in a lawsuit or dispute with the federal government or any federal agency? ☐ Yes ☐ No

a. If yes, please explain: _____

38. Do you know of any reason why you may be prejudiced for or against the Department of Justice? ☐ Yes ☐ No

a. If yes, please explain: _____

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39. Do you know of any reason why you may be prejudiced for or against the defendants?
☐ Yes ☐ No

a. If yes, please explain: _____

40. Mr. Martinez and representatives of Full Play will use a Spanish-English translator during the trial. Will their use of a translator cause you to be prejudiced for or against any defendant? ☐ Yes ☐ No

a. If yes, please explain: _____

41. Some of the witnesses at trial may be federal agents or other law enforcement officials. You will be instructed that their testimony is not entitled to any greater or lesser weight than that of any other witness simply because they are law enforcement officers. Would you have any difficulty following this instruction? ☐ Yes ☐ No

a. If yes, please explain: _____

42. Do you have any background, training, or experience in drafting, negotiating, or bidding on contracts? ☐ Yes ☐ No

a. If yes, please explain: _____

43. Do you or anyone close to you have any background, training, or experience in public relations, entertainment, or any media-related industry (*i.e.*, broadcasting, television, radio)? ☐ Yes ☐ No

a. If yes, please explain: _____

- b. If yes, did your background, training, or experience include broadcasting / marketing rights? ☐ Yes ☐ No

44. Do you have any background, training, or experience related to professional sports?
☐ Yes ☐ No

a. If yes, please explain: _____

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45. Have you, or any relative or close friend, taken any courses or had any background, training, or experience in finance, accounting, auditing, bookkeeping, or compliance?
☐ Yes (self) ☐ Yes (friends/family) ☐ No

a. If yes, please explain: _____

46. Have you ever worked for a large corporation? ☐ Yes ☐ No

a. If yes, please note when, for what company, and what position(s) you held:

47. Have you ever worked for a nonprofit organization, or a foreign or international corporation or organization? ☐ Yes ☐ No

a. If yes, please note when, for what entity, and what position(s) you held:

48. Have you ever held a managerial/leadership position in any company or organization, or served on the board of directors for a company or organization? ☐ Yes ☐ No

a. If yes, please note when, for what company or organization, and what position(s) you held:

b. What is the largest number of employees you have supervised at one time?

49. Have you ever worked for a company or organization where your position required you to be aware of, or enforce, regulatory rules/laws or compliance regulations or standards?
☐ Yes ☐ No

a. If yes, please describe your position and responsibilities: _____

50. Have you ever worked in an internal compliance department at a company or organization?
☐ Yes ☐ No

a. If yes, please describe your role and responsibilities within the department:

Juror #: _____

51. Have you ever reported a violation or filed a complaint of unethical / unlawful behavior to a compliance department, ethics board, human resources, or any other related department, or been involved in the investigation of such a violation or complaint? ☐ Yes ☐ No

a. If yes, please explain: _____

52. Have you, or someone close to you, ever been the subject of a complaint or report of unethical/unlawful behavior at a company or organization? ☐ Yes ☐ No

a. If yes, were you satisfied with the outcome? ☐ Yes ☐ No

53. Have you ever worked at a company where there have been allegations of wrongdoing by corporate executives or department heads? ☐ Yes ☐ No

a. If yes, please explain: _____

54. Would you have any difficulty treating a corporation in the same manner as an individual defendant for all purposes, particularly for the purpose of determining innocence or guilt? ☐ Yes ☐ No

a. If yes, please explain: _____

55. Are you interested in or involved with the sport of soccer (for example, playing, coaching or watching)? ☐ Yes ☐ No

a. If yes, how closely do you watch and follow soccer? _____

b. If yes, do you follow a particular team or league, and if so, which? _____

c. If yes, do you watch the FIFA World Cup or the Copa Libertadores tournament? ☐ Yes ☐ No

d. If yes, have you watched or followed, or do you plan to watch or follow, the 2022 World Cup or its Qualifiers? ☐ Yes ☐ No

56. Do you have any specialized knowledge about how soccer tournaments are run or operated? ☐ Yes ☐ No

a. If yes, please explain: _____

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57. Do you have any opinions about the world of professional sports and how business is conducted within it? ☐ Yes ☐ No

a. If yes, please explain: _____

Knowledge of the Trial Participants

58. The case for which you are summoned involves three defendants: Hernan Lopez, Carlos Martinez, and Full Play.

a. Are you familiar with Hernan Lopez or any of his family members? ☐ Yes ☐ No

i. If yes, please explain: _____

b. Are you familiar with Carlos Martinez or any of his family members?

☐ Yes ☐ No

i. If yes, please explain: _____

c. Are you familiar with Full Play or any of its executives, including Hugo Jinkis and Mariano Jinkis, and the current president, Carlos Fascetto? ☐ Yes ☐ No

i. If yes, please explain: _____

59. The judge presiding over this case is U.S. District Court Judge Pamela K. Chen. Do you know or are you familiar with Judge Chen or any member of her staff? ☐ Yes ☐ No

a. If yes, whom do you know and how do you know him/her/them? _____

60. Have you previously participated in any proceedings in the U.S. District Court for the Eastern District of New York in any capacity? ☐ Yes ☐ No

a. If yes, approximately when and under what circumstances? _____

Juror #: _____

61. Please review the list attached to this questionnaire (Attachment A) that provides the names of entities and persons whom you may hear about during the trial. Do you know or have any connection with any of the listed individuals or entities? ☐ Yes ☐ No

a. If yes, please explain: _____

Knowledge of the Case

You may have heard and/or read something about the case at some time. There is nothing wrong with having heard/read something about this case. It is important that you truthfully and fully answer the following questions concerning your knowledge about this case through the media or any other source.

62. This case involves alleged bribes paid to officials of a South American soccer federation, known as CONMEBOL, in exchange for media rights for certain soccer tournaments. Before today, had you heard or read anything about this case or about charges involving the alleged bribery of CONMEBOL officials in relation to Latin American soccer tournaments? ☐ Yes ☐ No

a. If yes, please describe what you have read or heard: _____

- b. If yes, please describe the amount of media coverage you have seen about this case. [Circle one]

- i. None (have not heard of this case before today)
- ii. A little (basically just heard that it exists)
- iii. A moderate amount (just basic coverage in the news)
- iv. A lot (sought out and read many articles and/or watched account on TV or online)

- c. If yes, have you ever commented on this case in a blog post, article, social media, or any other forum? ☐ Yes ☐ No

i. If yes, what did you comment? _____

- d. If yes, do you think that what you have read or heard would affect your ability to be fair and impartial in this case? ☐ Yes ☐ No

i. If yes, how: _____

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63. Are you familiar with Fox International Channels (“FIC”), a business that is now owned by Disney and was formerly a subsidiary of Twenty-First Century Fox, Inc.? ☐ Yes ☐ No

a. If yes, please explain: _____

64. Do you have any opinions about FIC, Disney, or Twenty-First Century Fox, Inc.?

a. If yes, please explain: _____

65. Generally speaking, the defendants are charged with crimes relating to bribery. They have pleaded not guilty to the charges and are presumed innocent unless proven guilty. Do you have any opinions about bribery that would prevent you from being a fair and impartial juror in this case? ☐ Yes ☐ No

a. If yes, please explain: _____

Legal Principles

66. The United States has the burden of proving the defendant’s guilt beyond a reasonable doubt. This burden never shifts to the defendant. The defendant is presumed innocent and cannot be found guilty unless the jury, unanimously and based solely on the evidence in this case, decides that the defendant’s guilt has been proven beyond a reasonable doubt. Will you accept and apply this rule of law? ☐ Yes ☐ No

a. If no, please explain: _____

67. Under the law, a defendant need not offer any evidence on his/her/its behalf. If a defendant chooses not to offer any evidence, the jury is not permitted to consider that fact in any way in reaching a decision as to whether a defendant has been proven guilty. Will you accept and apply these rules of law? ☐ Yes ☐ No

a. If no, please explain: _____

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68. The law also provides that under the Constitution, a person accused of a crime does not need to testify in his/her/its defense. If a defendant does not testify in his/her/its defense, you may not use his/hers/its silence against him/her/it. Will you accept and apply this rule of law? ☐ Yes ☐ No

a. If no, please explain: _____

69. Some of the witnesses in this case may be individuals who were involved in crimes themselves, including the offenses charged against the defendants. They would testify pursuant to an agreement with the government. Is there anything that will prevent you from evaluating their testimony fairly and impartially in accordance with the Judge's instructions? ☐ Yes ☐ No

a. If no, please explain: _____

70. Under the law, the facts are for the jury to determine and the law is for the judge to determine. At the conclusion of the case, the judge will instruct you on the law. You are required to accept the law as the judge explains it to you, even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Will you accept and apply this rule of law? ☐ Yes ☐ No

a. If no, please explain: _____

71. If you are selected to serve on this jury, will you consider and respect the view of the other jurors even if their views differed from yours, in accordance with the Court's instructions? ☐ Yes ☐ No

a. If no, please explain: _____

72. Under the law, bias or prejudice for or against either side must not enter into the deliberations of the jurors as to whether the guilt of the defendants has been proven beyond a reasonable doubt. Will you have any difficulty following this rule? ☐ Yes ☐ No

a. If yes, please explain: _____

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73. This case may receive attention in the media, including in the newspaper, on television, on the radio and over the Internet. The judge will instruct you that you are not to read, watch or listen to such media. Under the law, you are to base your decision on the evidence presented at trial, not on what is reported in the media. Will you have any difficulty accepting the proposition that the only evidence you should consider is the evidence received in this courtroom and that you are to avoid and ignore any statements made by the media? ☐ Yes ☐ No

a. If yes, please explain: _____

74. During the trial, some testimony and documentary evidence may be presented in the form of an English translation of Spanish or Portuguese. You will be instructed to rely on the English translation, even if you understand Spanish or Portuguese, and you may not substitute your own translation for the one provided in evidence. Will you have any difficulty following this rule? ☐ Yes ☐ No

a. If yes, please explain: _____

75. Do you have any moral, religious, or ethical beliefs that prevent you from sitting in judgment of another person? ☐ Yes ☐ No

a. If yes, please explain: _____

76. Is there anything else, whether about this case, the issues, or the people involved in this case, that would prevent you from being an impartial juror? ☐ Yes ☐ No

a. If yes, please explain: _____

77. Is there anything in your personal experience or anything about your beliefs or values that has not been covered in this questionnaire, but which might affect your ability to judge the facts and provide a fair verdict in this case? ☐ Yes ☐ No

a. If yes, please explain: _____

Juror #: _____

78. Is there anything else that you think the Judge or parties should know about you?
☐ Yes ☐ No

a. If yes, please explain: _____

79. Are there any questions that you would prefer to discuss privately? If so, please indicate the question numbers here: _____

Scheduling And Ability To Serve

80. This trial is scheduled to begin **XX-XX, XXXX**, and is expected to last approximately **five to six weeks**. The end of the sixth week is **XX-XX, XXXX**. The trial days will be Monday through Friday, from 9:30 a.m. to 5:30 p.m. Is there an important reason why you could not serve on a jury for this period of time? ☐ Yes ☐ No

a. If yes, please explain: _____

81. Is there anything (for example, health, job, family obligations, etc.) that would interfere with your ability to serve as a juror in this case? ☐ Yes ☐ No

a. If yes, please explain: _____

82. Will you be paid your salary while you serve jury duty? ☐ Yes ☐ No ☐ Not sure

83. This questionnaire has tried to direct your attention to things that may affect your ability to be a fair and impartial juror. Apart from any prior question, is there any fact, circumstance, opinion, or experience that would affect your ability to render a fair and impartial verdict? ☐ Yes ☐ No

a. If yes, please explain: _____

Juror #: _____

UNITED STATES v. HERNAN LOPEZ, CARLOS MARTINEZ
AND FULL PLAY GROUP, SA
Cr. No. 15-CR-252 (S-3) (PKC)

ATTACHMENT A:

**Names of People Who Might Testify or Who Might Be Discussed During Trial and
Names of Places That Might Be Discussed During Trial**

*Please circle the name of any person or place listed below that you
know or with which you have any connection.*

A. Defendants

1. Hernan Lopez
2. Carlos Martinez
3. Full Play Group

B. Defense Team Seated at Defendants' Table

[Placeholder]

C. Government Team Seated at Government's Table

[Placeholder]

D. Possible Witnesses and Other Names

[Placeholder]

E. Entities and Organizations

[Placeholder]

(Please put the question number in front of your answer)

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.